



Appendix H

BIOLOGICAL RESOURCES LETTER REPORT





March 5, 2010

CRB-03

Mr. Jason Goff
City of Carlsbad
Planning Department
1635 Faraday Avenue
Carlsbad, CA 92008

Subject: Biological Resources Letter Report for the Westfield Plaza Camino Real Revitalization Project in Carlsbad, California

Dear Mr. Goff,

This letter report describes existing biological conditions for the 80.8-acre Westfield Plaza Camino Real Revitalization Project (hereafter referred to as “proposed project” or “project”) site located in the City of Carlsbad (City), California and provides the project applicant, public, resource agencies, and City of Carlsbad with the necessary information to assess project impacts to biological resources.

PROJECT LOCATION AND EXISTING SITE CONDITIONS

The project site consists of approximately 80.8 acres of land and is located in the northern portion of the City (Figure 1). The City is bordered to the north by Oceanside; to the south by Encinitas; to the east by Vista, San Marcos, and San Diego County; and on the west by the Pacific Ocean. The project site is generally located south of Buena Vista Creek and State Route 78, west of El Camino Real, north of Marron Road (although the southeastern portion of the project site is bisected by Marron Road), and east of South Vista Way (Figure 2).

The project site is relatively level, with an elevation of approximately 26 to 38 feet above mean sea level (AMSL). Topographically, the site generally slopes gently to the west-northwest, with a distinct grade break extending generally east-west through the site. Currently, the project site is developed as a two-story enclosed shopping center with retail specialty shops, a movie theater, a portion of a vacant office building, and surface parking lots.

No natural communities are present on the project site, although Buena Vista Creek is located immediately adjacent to the northern boundary of the site (refer to Figure 2). Some landscaped areas occur throughout the project, which are limited to groundcover and sporadic trees. Based on the project drainage report (Hofman Planning and Engineering 2010a), on-site runoff generally flows north toward Buena Vista Creek and south toward Marron Road and into Buena Vista Creek. The combined flow ultimately enters Buena Vista Lagoon approximately 0.2 mile west of the project site.

A search of the California Department of Fish and Game's (CDFG's) California Natural Diversity databases (CNDDDB; CDFG 2005) was performed to determine if any sensitive species were reported within the project site or in Buena Vista Creek immediately adjacent to the northern boundary of the project site. No sensitive species were reported in the database on the project site; however, southwestern willow flycatcher (*Empidonax traillii extimus*) was reported from Buena Vista Creek directly to the north of the project site in 1984. Surveys conducted for the Review Draft Final Oceanside Subarea Habitat Conservation Plan/Natural Communities Conservation Plan (Oceanside Draft Subarea Plan; AMEC Earth & Environmental and Conservation Biological Institute 2005), in which this portion of Buena Vista Creek is located, did not detect southwestern willow flycatcher or any other sensitive species.

The project site is located within the planning area of the Habitat Management Plan for Natural Communities in the City of Carlsbad (HMP; City of Carlsbad 2004), although it is not identified within the core habitat area. In addition, the site and vicinity are not designated as Hardline Preserve Areas. Buena Vista Creek to the north of the project site is located in the Oceanside Subarea Plan's Off-site Mitigation Zone I.

DESCRIPTION OF PROPOSED PROJECT

The proposed project would involve adoption of a Specific Plan and the implementation of a Site Development Permit for the demolition, reconfiguration, and/or reconstruction of approximately 179,631 square feet (sf) of existing square footage (mainly the existing Robinson's-May department store building), and the development of up to approximately 35,417 sf of new retail/commercial uses, for a total of approximately 1,186,509 sf (refer to Figure 3). The proposed revitalization is primarily focused on the easterly half of the site adjacent to El Camino Real and the southerly one-third of the site adjacent to Marron Road, displacing roughly 306 surface parking stalls and creating new internally and externally oriented retail space, restaurant pad sites, theater, and grocery market or other retail/lifestyle/entertainment commercial uses. The project would primarily be built within the existing building envelopes, with a small amount of new building area adjacent to the existing envelopes and in outparcel locations. Additionally, the existing theater and adjacent parking area at the southwestern corner of the intersection of El Camino Real/Marron Road would be demolished, and a new retail outparcel with a 42-space parking lot would be built in its place. Although the Specific Plan would address the entire project site, proposed construction/site improvements permitted with the Site Development Permit would occur no closer than 175 feet from Buena Vista Creek (Figure 3).

IMPACTS TO BIOLOGICAL RESOURCES

Direct Impacts

The proposed project would not result in direct impacts to biological resources, as the site is fully developed and none of the proposed impact areas contain sensitive vegetation or species. No direct impacts to off-site areas, including Buena Vista Creek (which is in the Oceanside Draft Subarea Plan's Off-site Mitigation Zone I), would occur. As shown in Figure 3, all construction

would occur a minimum of approximately 175 feet away from the creek along the northeastern, eastern and southeastern side of the mall, and the majority of the project construction would be at least approximately 350 feet away from the creek.

Indirect Impacts

Potential indirect impacts that may be caused by implementation of the proposed project are associated with edge effects. Edge effects take place when disturbance, development, or grading occurs within or adjacent to an undeveloped area with sensitive biological resources. Edge effects include human activity, invasive plant species, nuisance animal species, animal behavioral changes, night lighting, decreased water quality, and roadkill. Additionally, the proposed project has potential to cause temporary indirect impacts due to noise and fugitive dust. The following is an analysis of these potential indirect effects of adopting a Specific Plan and redeveloping approximately 15 acres of the 80-acre site.

Human Activity

Increases in human activity in an area often result in degradation of sensitive vegetation by further fragmenting habitat through creation of trails, removal of existing vegetation, and illegal dumping (landscape debris, trash, and other refuse). Human activity adjacent to Buena Vista Creek is expected to remain the same with project implementation since all construction would occur a minimum of approximately 175 feet away from the creek along the eastern and southeastern side of the mall, and the majority of the project construction would be at least approximately 350 feet away from the creek. Therefore, no significant impact associated with human activity would occur.

Invasive Plants

Invasive plants have potential to spread from developed or disturbed areas to adjacent native habitats. Such invasive species can displace native vegetation, reducing the diversity of native habitats and potentially increasing flammability, changing ground and surface water levels, and adversely affecting native wildlife. The project site currently contains some sparsely landscaped areas. Areas to be landscaped or re-landscaped during project construction would not include land adjacent to Buena Vista Creek. Because the construction of the proposed project would occur on already developed land and because no invasive plant species on the Cal-IPC "Invasive Plant Inventory" list would be incorporated in the landscape concept of the Specific Plan or project's landscape plan, impacts due to plant invasions are expected to be less than significant.

Nuisance Animal Species

Domesticated animals, particularly cats, are known to impact native wildlife in the habitat areas immediately adjacent to development. The proposed project (which would involve redevelopment and expansion of an existing shopping center), however, would not result in introduction of domestic animals to the surrounding habitat, as the project would not include

residential development that may introduce pets into the area. Other nuisance animal species may include, for example, brown-headed cowbirds (*Molothrus ater*), which are invasive nest predators that can greatly reduce the breeding success of native birds. This species may be in the area, but the proposed project would not increase the number of brown-headed cowbirds or other nuisance animals in the surrounding habitat. Therefore, no impact associated with nuisance animal species is expected.

Night Lighting

Night lighting exposes wildlife species to an unnatural light regime and may alter their behavior patterns, causing them to have lower reproductive success, and thus reducing species diversity. Current operations of the shopping center include night lighting in the parking areas nearest the creek and along the façade of the mall, which would not change or increase with implementation of the proposed project. As stated in the Development Standards of the Specific Plan, outdoor lighting would be directed downward and designed to minimize light and glare impacts to adjacent properties, including Buena Vista Creek. Therefore, impacts due to night lighting would be less than significant.

Water Quality

The use of petroleum products (i.e., fuels, oils, lubricants) and erosion could potentially contaminate surface water, adversely affecting vegetation, aquatic animals, and terrestrial wildlife. The proposed project would result in a decrease in impervious surfaces, as the project site would be developed with more landscaping and pervious pavement than currently exists. The project would also include the addition of drainage swales to decrease the amount of runoff from the site consistent with the City Storm Water Management and Discharge Control Ordinance. Furthermore, implementation of best management practices (BMPs) per the City Grading Ordinance would reduce potential short-term water quality impacts during construction. Accordingly, short- and long-term impacts to Buena Vista Creek's water quality would be less than significant.

Roadkill

Roadkill impacts would be considered significant if they resulted in adverse effects to federally or state listed species. No such species are located on the project site; however, a southwestern willow flycatcher was observed in Buena Vista Creek, immediately adjacent to the northern boundary of the project site, in 1984. In the event that southwestern willow flycatcher is still in this location, it is unlikely that it would be physically impacted by vehicles, as birds can fly above roadways and vehicles and no increase in vehicle travel adjacent to the creek is anticipated. Therefore, any impacts due to roadkill would be less than significant.

Noise

Noise impacts would be considered significant if sensitive species were displaced and failed to breed. Although southwestern willow flycatcher was observed in Buena Vista Creek immediately north of the project site in 1984, due to the presence of a freeway (i.e., State Route 78) directly north of Buena Vista Creek in this area, as well as the current development on the other sides of the creek, it is unlikely that sensitive species, including southwestern willow flycatcher, would reside or breed in this small portion of the creek, as surveys conducted for the Oceanside Draft Subarea Plan have not detected such species in the area. In addition, the closest area of proposed construction associated with the project would be approximately 175 feet away from Buena Vista Creek, and the majority of the project construction would be at least approximately 350 feet away from the creek. Due to the distance, it is anticipated that temporary construction noise would not affect any animal species, including during breeding seasons. With regard to project operation, because the site is currently developed and operating as a commercial use, and the number of vehicles associated with the project traveling near the creek is not expected to increase, animals utilizing the creek in this area would not be affected by project operational noise. Impacts associated with noise are therefore anticipated to be less than significant.

Fugitive Dust

Dust released during construction activities could cover vegetation in adjacent habitat areas, which could reduce native plant productivity, in turn displacing native vegetation, reducing diversity, encouraging weed invasion, adversely affecting wildlife, and increasing fire susceptibility. The proposed project has been designed to incorporate dust control measures by the City Grading Ordinance. In addition, as stated above, the closest area of proposed construction associated with the project would be approximately 175 feet away from Buena Vista Creek, although the majority of the project construction would be at least approximately 350 feet away from the creek. As a result, the effects of dust on surrounding vegetation would be less than significant.

CONCLUSION

No direct impacts associated with construction or operation of the proposed project would occur. In addition, all potential indirect impacts to nearby sensitive biological resources (specifically Buena Vista Creek) would be less than significant, and no mitigation measures would be required. In addition, the proposed project would not conflict with the City of Carlsbad's HMP or Oceanside Draft Subarea Plan.




Letter to Mr. Jason Goff
March 5, 2010

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If you have any questions regarding this letter report, please do not hesitate to contact me at 619-462-1515.

Sincerely,


for Greg Mason
Vice President, Biological Services Division

REFERENCE

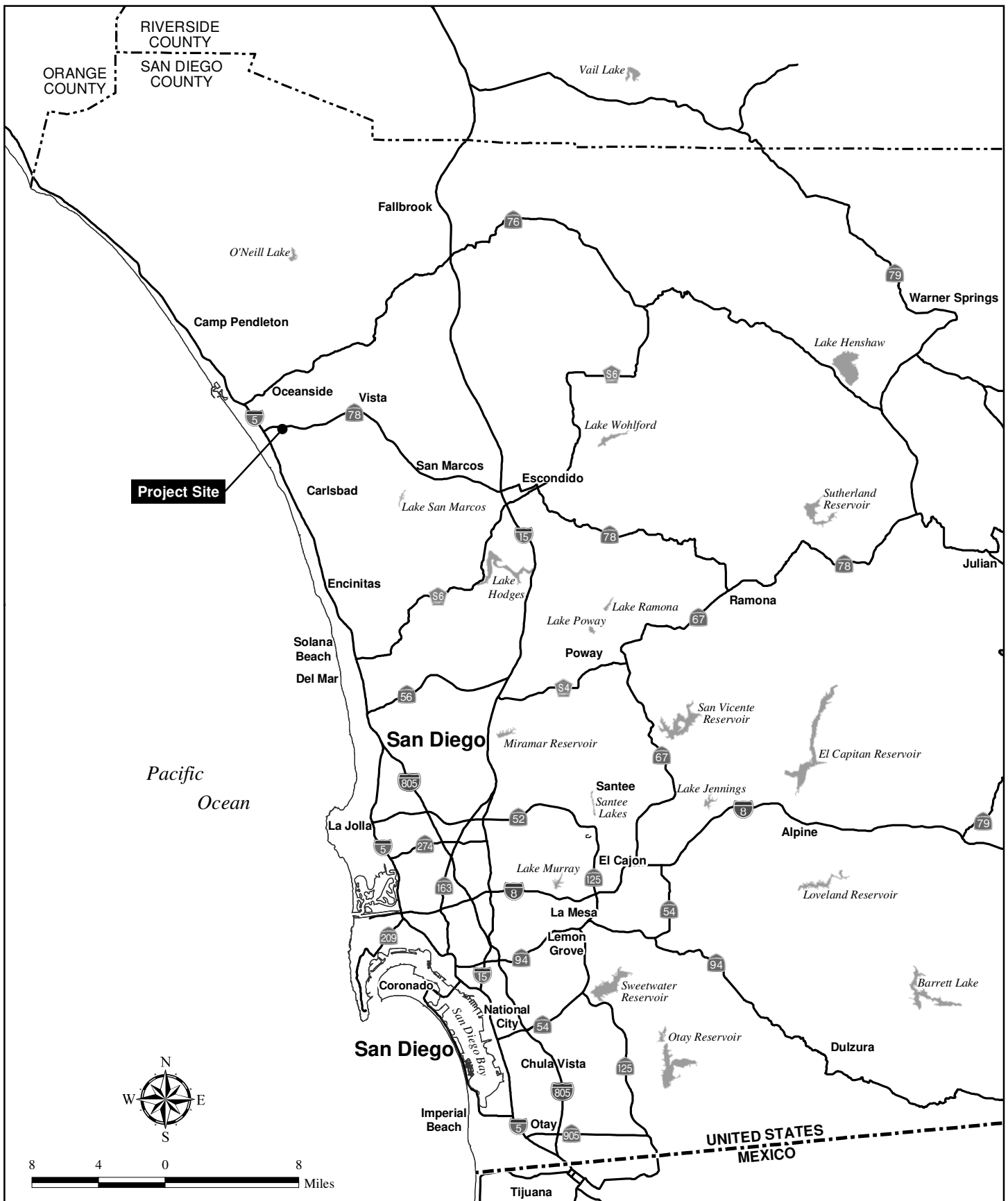
AMEC Earth & Environmental (AMEC) and Conservation Biological Institute (CBI). 2005. Review Draft Final Oceanside Subarea Habitat Conservation Plan/Natural Communities Conservation Plan. December.

California Department of Fish and Game (CDFG) California Natural Diversity Data Base (CNDDDB). 2005. RareFind Database Program, Version 3.0.5. Data updated April 29.

City of Carlsbad. 2004. Habitat Management Plan for Natural Communities in the City of Carlsbad. November.

Hofman Planning & Engineering (Hofman). 2010a. Drainage Report for Plaza Camino Real Revitalization. January 29.

2010b. Draft Plaza Camino Real Specific Plan. January 10.



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Regional Location Map

PLAZA CAMINO REAL REVITALIZATION

Figure 1

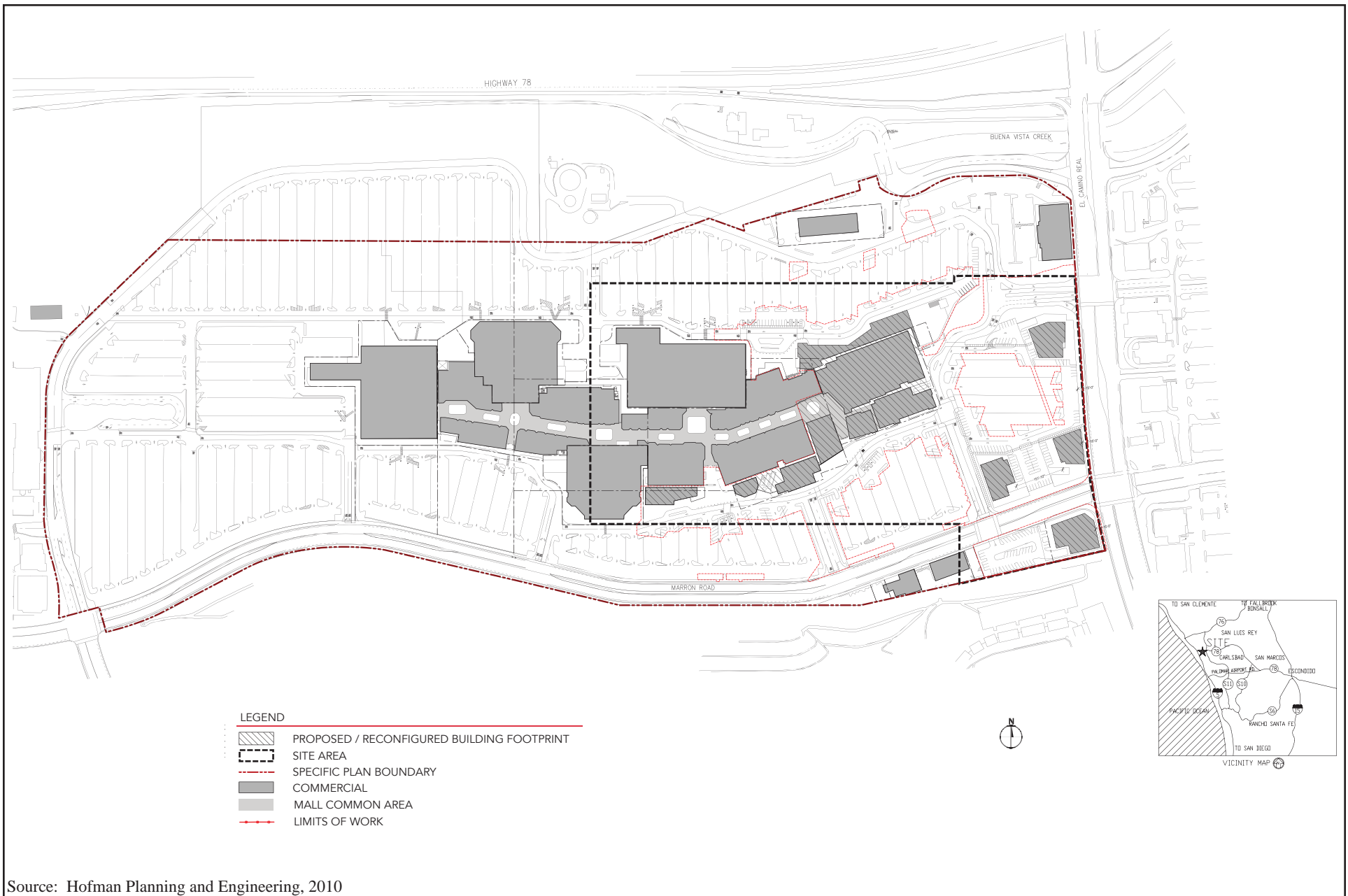


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Aerial Photograph

PLAZA CAMINO REAL REVITALIZATION

Figure 2



Site Plan

PLAZA CAMINO REAL REVITALIZATION

Figure 3